

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA §
§ Case No: 3:12-CR-413-L
v. § 3:13-CR-030-L
§ Hon. Sam A. Lindsay
BARRETT LANCASTER BROWN §

AGREED MOTION TO CONTINUE PRETRIAL DEADLINES

Defendant BARRETT LANCASTER BROWN files this agreed motion for a continuance and in support thereof, would show the Court the following:

I.

This matter is presently scheduled for a trial on May 19, 2014. The Court has set a deadline of February 28, 2014 for the filing of pretrial motions, and March 14 for responses. *Id.*

The undersigned has encountered an unexpected issue that may not allow timely filing on February 28, 2014. A continuance of **one business day** is needed to address the issue. The continuance would move the pretrial motions deadline to March 3, 2014 and the deadline for responses to March 17, 2014.

The continuance will not effect any hearing or trial dates. The undersigned has conferred with counsel for the government, who is in agreement with this request.

II.

WHEREFORE, PREMISES CONSIDERED, Defendant Brown moves to continue the pretrial motions deadlines by **one business day** to March 3, 2014 for pretrial motions and March 17, 2014 for responses. Counsel for the government is in agreement with this request.

Respectfully submitted,
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CERTIFICATE OF CONFERENCE

I certify that on February 28, 2014, I conferred with Ms. Candina Heath, counsel for the government and she is in agreement with the relief requested.

/s/ Ahmed Ghappour
AHMED GHAPPOUR
/s/ Charles Swift
CHARLES SWIFT
/s/ Marlo P. Cadeddu
MARLO P. CADEDDU
Attorneys for Barrett Lancaster Brown

CERTIFICATE OF SERVICE

I certify that today, February 28, 2014, I filed the instant motion using the Northern District of Texas's electronic filing system (ECF) which will send a notice of filing to all counsel of record.

/s/ Ahmed Ghappour _____
AHMED GHAPPOUR
/s/ Charles Swift _____
CHARLES SWIFT
/s/ Marlo P. Cadeddu _____
MARLO P. CADEDDU
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